

## COMMENT SET 8



March 18, 2004

**CITY COUNCIL**  
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*Councilmember*

**CITY MANAGER**  
Frederick C. Stouder

Mr. Eric L. Gillies  
California State Lands Commission  
100 Howe Ave., Suite 100 South  
Sacramento, CA 95825-8202

**VIA FACSIMILE AND U.S. MAIL**

**Subject: Draft EIR for Revised PRC-421 Pier Removal Project**

Dear Mr. Gillies:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Revised PRC-421 Pier Removal Project. We further appreciate your offer to include this comment letter in the record of comments on the DEIR, even though it is being submitted slightly after the comment deadline. The City of Goleta agrees with and supports the comments made by the County of Santa Barbara's Energy Division in their letter of March 10, 2004. Additionally, the City of Goleta has the following comments.

**8-1**

The revised project proposes to leave a significant amount of rubble from the toppled pier supports. This seems contrary to the normal requirements related to lease abandonment and cleanup and may set a precedent for similar abandonment projects. The City prefers the full removal of caissons as contemplated in the "Original Project" Alternative. In this alternative, however, no provision is made for replacement of seabird roosting/nesting habitat. A new alternative proposing full removal of the pier structure **and** creation of replacement habitat ought to be considered in the EIR. This alternative would have to propose some other method of reinforcing the roost platforms, if reinforcement is needed. **Furthermore, because of the long-term visual impacts of the proposed roosting platforms and uncertainties on resources for maintenance, the City prefers an offsite alternative for the replacement nesting/roosting habitat.** (Please refer to the other alternatives listed in the May 28, 2002 letter from the California Department of Fish and Game.)

**8-2**

Please elaborate on what is needed to "satisfy the California State Lands Commission (CSLC) requirements related to lease

**8-3**

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abandonment and cleanup after completion of oil and gas operations". As this is one of the stated objectives on page 1-2, elaboration would help evaluate the achievement of this objective in the proposed project in comparison to project alternatives.

**8-3**

The stated location of the PRC 421 on page 1-2 should acknowledge that the pier structure is off the coast of the City of Goleta, in Santa Barbara County, rather than just off the coast of Santa Barbara County. Compare the text in the executive summary with the text in Section 3.3.1, which states that the location is off the coast of the City of Goleta.

**8-4**

The EIR states on page 1-12 that a new lease to the California Department of Fish & Game (CDFG) will be issued for the seabird platforms. Will CDFG be solely responsible for the costs of maintaining these structures should they need repairs or replacement? Does CDFG have the financial resources to assume this responsibility? A mitigation measure that establishes an endowment for the monitoring and maintenance of these platforms would help ensure the proper upkeep of these structures. The installation of these platforms as habitat replacement is a key mitigation measure, and some attention to maintenance is warranted.

**8-5**

On page 1-17, in the summary of the analysis of the No Project alternative, stated that this alternative would result in hazards to the public's health and safety. The text should also note the potential impact to seabirds if the piers topple during the nesting season.

**8-6**

With respect to the jetting to expose the caissons 4 feet below the mudline, the EIR should discuss in what season this work will occur and any seasonal fluctuations of mudline depth. If there is such a fluctuation in sediment cover, the magnitude of the fluctuation should be stated, and the jetting and cutting of caissons should occur when sediment thickness is least, to avoid subsequent exposure of the cut caisson tops.

**8-7**

Information on the average weight of quarry stone to be placed on sea-bottom is provided on page 3-23. The EIR should state whether there is any susceptibility of placed rock fill to mobilization during high wave events.

**8-8**

The discussion of blast effects on page 4.5-3 states the distance from the detonation site and risk to Venoco's gas seep pipeline and Platform Holly. It should also state the distance of Venoco's main Holly to Shore production lines (gas and oil) and discuss the risk to these pipelines.

**8-9**

Impact GEO-6 on page 4.1-14 discusses the potential for alteration of coastal currents. It states the maximum depth (30 feet) of the remaining caisson, but the range of depth should be stated instead, as fill placed or left in the shallower portions would be more

**8-10**

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prone to influence currents and sediment transport. The same comment applies to GEO-7 on page 4.1-15.

**8-10**

Impact TRF-4 on page 4.3-11 states that the depth to quarry rock substrate and caisson remnants would be 32 feet. Please rectify this with the depth in Impact GEO-6 and revise accordingly.

**8-11**

If you have any questions about these concerns, you may contact me at (805) 961-7540.

Sincerely,

Kenneth M. Curtis  
Director of Planning & Environmental Services

cc. Fred Stouder, City Manager  
Eric Larson, California Department of Fish and Game  
Alison Dettmer, California Coastal Commission  
Steve Chase, Santa Barbara County Energy Division



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**Commenting Party:** City of Goleta, Kenneth M. Curtis, Director of Planning and Environmental Services

**Date of Comment(s):** March 18, 2004

**Responses to Comment(s):**

- 8-1. Please refer to Responses to Comments from the County of Santa Barbara.
- 8-2. Please refer to Responses to Comments 3-1, 3-2, and 3-8 from the County of Santa Barbara.
- 8-3. Please refer to the first paragraph in Response to Comment 3-2 from the County of Santa Barbara.
- 8-4. The text of Section 1.0, Executive Summary of the DEIR has been revised to state the Proposed Project site is off the coast of the city of Goleta (please see errata pages)
- 8-5. Please refer to Response to Comment 3-8 from the County of Santa Barbara.
- 8-6. The text of Section 1.0, Executive Summary of the DEIR has been revised to incorporate the referenced statement. Section 6.0, Alternatives Analysis has likewise been revised (please see errata pages).
- 8-7. The magnitude of sediment fluctuation in the project area is described in Section 4.1.2.3, Geology and Sediment Transport Impacts, of the DEIR as ranging from zero to an estimated 4 feet. The complex set of factors associated with sediment transport is described in the setting discussion of the Geology and Coastal Process Section of the DEIR (Section 4.1.1).  
  
As described in Section 3.6, Project Schedule of the DEIR, the actual offshore work activities will be restricted to 26 days in the months of September and October to avoid the CDFG identified bird nesting period from mid-April to late-August, as well as, the whale migration period from November 30th to June 1st. As indicated in Section 3.4.2, the caissons H beams will be exposed approximately 4 feet below the mudline to allow attachment of the proposed explosive charges.
- 8-8. Placement of the quarry rock would be installed such that its surface is below the direct effects of wave action and maximum water velocities; accordingly, the quarry rock would not be expected to move during high wave events.

- 8-9. Based upon the pipeline locations as shown on the Proposed Project Anchoring Plan, the Venoco seep pipe is slightly closer to the pier remnant site than the main platform to shore production pipeline. Please refer to Response to Comment 3-4 from the County of Santa Barbara.
- 8-10. We concur with the conclusion regarding the influence of “fill” on currents. The discussion of GEO-6 on page 4.1-14 of the DEIR provides, in part, “the proposed submerged hardbottom substrate will decrease the along-shore and cross-shore by no more than 16 percent within the wave shelter zone.” The DEIR concludes that the impact of the Proposed Project will be adverse, but not significant.
- 8-11. As can be seen on Figure 4.4-1, 1999 Side Scan Sonar Survey of Hard Bottom Features Near PRC-421 Pier Remnant, all of the pier columns are located at a depth of 30 to 34 feet below mean low low water (please see errata pages).